



July 22, 2019

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: IB Docket 18-86 (In the Matter of Streamlining Licensing Procedures for Small Satellites)

Dear Ms. Dortch:

On July 18th, 2019, on behalf of UbiquitiLink, Inc., Charles Miller (Co-founder and CEO), Margo Deckard (Co-founder and COO), Tony DeTora (VP of Government Affairs), Chris Guttman-McCabe (Consultant), and Jot Carpenter (Consultant) met with Aaron Goldberger and Zenji Nakazawa (who joined by phone) -- both of the Office of Chairman Pai; Erin McGrath -- Office of Commissioner O'Rielly; Will Adams -- Office of Commissioner Carr; Umair Javed -- Office of Commissioner Rosenworcel; and Bill Davenport -- Office of Commissioner Starks. Mr. Carpenter joined for the Goldberger/Nakazawa, Adams, and Javed meetings. The purpose of the meetings was to introduce the UbiquitiLink team and the product and services that they are creating, highlight the company's upcoming small satellite launch, thank the Chairman's Office for the Small Satellite Item that the Chairman and Commissioners will vote on this month, and share UbiquitiLink's support of the item.

As described in the meetings, UbiquitiLink is a Virginia-based company that successfully has completed initial space-to-ground tests of the fundamental technology required to provide connectivity for cell phone users virtually anywhere on the globe using low-earth-orbit nanosatellites. UbiquitiLink's technology allows standard cell phones, without any changes in hardware or software, to be connected everywhere, seamlessly shifting from a terrestrial tower to a satellite overhead. The UbiquitiLink network will provide connectivity with existing cell phones in the most isolated areas, providing a safety net to people in remote locations, whether it's on the high seas or high in a mountain range. The network will also give relief agencies and first responders a highly reliable means of communication when terrestrial networks are down following natural and man-made disasters.

Regarding the Commission's upcoming Small Satellite Report and Order, UbiquitiLink stated in each of the meetings that the item as drafted will be very beneficial to the company, allowing them to dedicate capital resources to building the company and launching a product, resources that otherwise would have gone



to filing fees. UbiquitiLink did ask for clarification on several points in the item in advance of the vote -- first that the new rules and processes will allow small satellite companies such as UbiquitiLink to file more than one batch of applications under the ten for \$30,000 format, and second, that the rules will allow for satellite-to-satellite communication: (1) within the 10-satellite application, (2) between satellites that have been filed under different 10-satellite applications, and (3) with satellites from other companies.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Tony DeTora
VP of Government Affairs